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 ++ OF COUNSEL

April 11, 2025

**VIA ECF**

Hon. Lee G. Dunst  
 U.S. District Court  
 Eastern District of New York  
 100 Federal Plaza, Courtroom 830  
 Central Islip, New York 11722

**Re: AA Medical, P.C. v. Iron Workers Local 40, 361 & 471 Health Fund  
 Case No. 22-v-1249(ENV)(LGD)**

Dear Judge Dunst,

This firm represents Defendant Local 40, 361 & 417 Health Fund ("Defendant") in the above referenced matter. We submit this status letter in response to Your Honor's April 2, 2025 Order.

Defendant intends to file a motion for summary judgment and is conferring with Plaintiff's counsel regarding a briefing schedule and will submit the briefing schedule by Friday, April 18, 2025. There have been no further settlement discussions between the parties.

Thank you for your time and attention to this matter.

Respectfully,

COLLERAN, O'HARA & MILLS L.L.P.

By: /s/ Thomas P. Keane  
 THOMAS P. KEANE

3028-0010

cc: Dimitri Terest, Esq. via ECF  
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